

Message

From: Bertrand, Charlotte [Bertrand.Charlotte@epa.gov]
Sent: 11/8/2017 4:48:39 PM
To: Bennett, Tate [Bennett.Tate@epa.gov]; Morris, Jeff [Morris.Jeff@epa.gov]
CC: Keigwin, Richard [Keigwin.Richard@epa.gov]; Beck, Nancy [Beck.Nancy@epa.gov]; Ferguson, Lincoln [ferguson.lincoln@epa.gov]; Hanley, Mary [Hanley.Mary@epa.gov]; Pierce, Alison [Pierce.Alison@epa.gov]
Subject: RE: Quick favor

Tate – hope these help. Charlotte

Use of Per- and Polyfluoroalkyl Substances (PFASs) in Aqueous Film Forming Foams (AFFF)

- AFFF that contain PFASs (such as perfluorooctane sulfonate (PFOS), perfluorooctanoic acid (PFOA), and short-chain fluorotelomers) are typically used to extinguish highly flammable or combustible liquid Class B fires, such as fires involving gas tankers and oil refineries. The biggest users of AFFF in the U.S. are military, petrochemical, and aviation industries.
- While the majority of AFFF is being manufactured using primarily telomer-based short-chain substances (i.e. not PFOA or PFOS), there is continued use of existing stocks of PFOA and PFOS. In addition, a few companies continue to manufacture (including import) AFFF with long-chain PFAS chemicals such as PFOA and PFOS.
- Releases of AFFF should be minimized because PFAS chemicals are persistent and can contaminate groundwater. EPA encourages the use of training foams that are available which simulate AFFF without containing PFAS chemicals, and restricting AFFF use for emergencies only, as the Air Force has done. In addition, when AFFF is used, it is a good idea to remove and destroy foam residue (by sending it to a high temperature incinerator for thermal destruction) before contamination can occur.
- Significant New Use Rules (SNURs) under the Toxic Substances Control Act (TSCA) require Significant New Use Notices (SNUNs) for production and importation of PFOS-based products, including firefighting foams. However, the Agency's SNUR regulations do not affect the continued use of existing stocks of the PFOS-based chemicals that had been manufactured or imported into the U.S. before SNURs took effect in 2002.
- PFOS-based AFFF discharges may be subject to various local and state restrictions.
- Canada and EU have banned the use of PFOS-based AFFF (except for some critical uses) and require these foams to be disposed as hazardous waste.

From: Bennett, Tate
Sent: Wednesday, November 08, 2017 7:43 AM
To: Morris, Jeff <Morris.Jeff@epa.gov>
Cc: Bertrand, Charlotte <Bertrand.Charlotte@epa.gov>; Keigwin, Richard <Keigwin.Richard@epa.gov>; Beck, Nancy <Beck.Nancy@epa.gov>; Ferguson, Lincoln <ferguson.lincoln@epa.gov>
Subject: Re: Quick favor

Thank you all!

On Nov 8, 2017, at 5:56 AM, Morris, Jeff <Morris.Jeff@epa.gov> wrote:

We will have something this morning.

From: Bertrand, Charlotte
Sent: Wednesday, November 08, 2017 6:23 AM
To: Keigwin, Richard <Keigwin.Richard@epa.gov>
Cc: Bennett, Tate <Bennett.Tate@epa.gov>; Beck, Nancy <Beck.Nancy@epa.gov>; Ferguson, Lincoln

<ferguson.lincoln@epa.gov>; Morris, Jeff <Morris.Jeff@epa.gov>

Subject: Re: Quick favor

Yes. We can get something together this morning.

Sent from my iPhone

On Nov 8, 2017, at 6:09 AM, Keigwin, Richard <Keigwin.Richard@epa.gov> wrote:

I think this one may belong to OPPT. Looping in Jeff Morris.

Rick Keigwin
Director, Office of Pesticide Programs
U.S. Environmental Protection Agency
Phone: 703-305-7090
Website: www.epa.gov/pesticides
Sent from my iPhone

On Nov 7, 2017, at 10:47 PM, Bennett, Tate <Bennett.Tate@epa.gov> wrote:

Adding Charlotte too!

On Nov 7, 2017, at 10:47 PM, Bennett, Tate
<Bennett.Tate@epa.gov> wrote:

Hi guys! I just learned the Admin is in a meeting tomorrow where pfas chemicals in the context of firefighting foams that enter drinking water might come up. Any chance your teams have a 3-5 sentence status update? The meeting is at 12:15 so hopefully that's enough time?